

1 MELINDA HAAG (CABN 132612)
United States Attorney
2
3 MIRANDA KANE (CABN 150630)
Chief, Criminal Division
4
5 J. MARK KANG (NYBN 4033999)
Special Assistant United States Attorney

450 Golden Gate Ave., Box 36055
San Francisco, California 94102
Telephone: (415) 436-7050
Fax: (415) 436-7234
E-Mail: Mark.Kang@usdoj.gov

Attorneys for the Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, }
Plaintiff, } Nos. CR 12-0090 RS
v. } CR 12-0156 RS
} STIPULATION AND [PROPOSED]
} ORDER EXCLUDING TIME UNDER 18

PABLO PEREZ-ANGUIANO,
a/k/a Jose Escalera Anguiano) ORDER EXCEEDING TIME UNDER F.R.C.P.
) U.S.C. § 3161

a/k/a JOSE Escalera Aguilera,
a/k/a Jose Escalera,
a/k/a Mario Escalera,

Defendant.

UNITED STATES OF AMERICA,)

Plaintiff,

V.

JOSE ESCALERA-AGUILAR,

Defendant.

On June 12, 2012, the parties in this case appeared before the Court. At that time, the Court set the matter to July 24, 2012. The parties have agreed to exclude the period of time between June 12, 2012 and July 24, 2012 from any time limits applicable under 18 U.S.C. §

STIPULATION & [PROPOSED] ORDER EXCLUDING TIME
CR 12-0090 RS and CR 12-0156 RS

1 3161. The parties represented that granting the exclusion would allow the reasonable time
2 necessary for effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties
3 also agree that the ends of justice served by granting such an exclusion of time outweigh the best
4 interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). At the
5 hearing, the Court made findings consistent with this agreement. SO STIPULATED:

6

7

8

MELINDA HAAG
United States Attorney

9

10

DATED: June 13, 2012

/s/

11

J. MARK KANG
Special Assistant United States Attorney

12

13

DATED: June 13, 2012

/s/

14

SHAWN HALBERT
Attorney for PABLO PEREZ-ANGUIANO

15

16

17

18

19

20

21

22

23

24

25

26

27

28

[PROPOSED] ORDER

For the reasons stated above and at the June 12, 2012 hearing, the Court finds that the exclusion from the time limits applicable under 18 U.S.C. § 3161 of the period from June 12, 2012 through July 24, 2012 is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §3161(h)(7)(A). Denying the requested exclusion of time would deprive the parties of the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: 6/18/12

THE HONORABLE RICHARD SEEBORG
United States District Judge